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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**Re: Paging Network, Inc., Motion for Extension of Time in *Calling Party Pays Service Option in the Commercial Mobile Radio Services*, Notice of Inquiry, WT Docket No. 97-207, released on October 23, 1997**

Dear Ms. Salas:

Paging Network, Inc. ("PageNet"), by its attorneys and pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, hereby submits a motion for extension of time in the above-referenced proceeding. Please find enclosed the original and five (5) copies of the motion. Please do not hesitate to contact the undersigned counsel at the above-referenced number if you should have any questions regarding this matter.

Respectfully submitted,



Peter A. Batacan  
Counsel to Paging Network, Inc.

cc (via hand-delivery):

Daniel Phythyon  
Rosalind K. Allen  
John Cimko  
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**In the Matter of** )  
 )  
**Calling Party Pays Service Option** ) **WT Docket No. CC 97-207**  
**in the Commercial Mobile** )  
**Radio Services** )

**MOTION FOR EXTENSION OF TIME**

Paging Network, Inc. ("PageNet"), by its attorneys, hereby files this motion for extension of time, pursuant to 47 C.F.R. § 1.46, with the Federal Communications Commission ("Commission") in order to extend the date for filing comments in the above-captioned proceeding. PageNet respectfully requests that the Commission grant its motion for an extension of time for the reasons set forth below.

The Commission seeks comment on a Notice of Inquiry ("NOI")<sup>1</sup> issued to gather information on a service option being offered by some Commercial Mobile Radio Service ("CMRS") providers, known as Calling Party Pays ("CPP"). The NOI seeks to develop a record on an exceptionally broad range of issues that would allow the Commission to explore and consider the competitive consequences of wider CPP implementation. The

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<sup>1</sup> *In the Matter of Calling Party Pays Service Option in the Commercial Mobile Radio Services*, Notice of Inquiry, WT Docket No. 97-207 (rel. October 23, 1997).

current comment date in the NOI is December 1, 1997, and the reply comment date is December 16, 1997.

PageNet seeks an extension of the NOI comment date in order to fully and adequately address the issues it raises. PageNet is concerned that the NOI focuses on CPP issues relating to broadband wireless services, while providing little discussion of CPP issues relating to paging. In this regard, PageNet, and others in the paging industry who may intend to offer substantive comments, face the additional challenge of having to define the issues CPP presents to paging services before they can begin to generate the information requested in the NOI. Moreover, the requested information itself requires a longer comment period -- based on the sheer complexity of the issues. Such issues include jurisdictional concerns, the relationship between CPP and interconnection, and technical uncertainties regarding infrastructure, contractual, and billing collection modifications that may be necessary.

In addition to their complexity, the issues require consideration of a substantial amount of technical, operational, and industry data -- all of which must undergo rigorous technical, economic, and legal analysis. For example, PageNet is operating CPP in a Chicago test market and is currently collecting, but only beginning to analyze, the data produced by that trial. Additional time to fully analyze this data before the initial round of comments is necessary for the company to prepare meaningful comments that assist the Commission in developing a sufficient record. The importance of having a full record upon which to decide whether to take action cannot be overstated since implementation of CPP would result in a dramatic transformation of the wireless industry. PageNet submits that the

time allotted simply does not provide enough time to comment on the diverse and difficult issues raised in the NOI.

Exacerbating the problems created by the short comment period and the breadth of the information requested by the NOI is the timing of the comment date. December 1 falls on the first working day after the Thanksgiving holiday. Due to the holiday, many PageNet personnel (and presumably other interested parties) necessary to gathering and analyzing the information will be away from work during some of the week before the comment deadline.

Accordingly, PageNet requests an extension of two weeks for the comment date, to December 15, 1997. Currently, the NOI allows fifteen days for reply comments. However, if the reply period were maintained, the extended comment date would make the replies due in the middle of the year-end holidays. In order to alleviate this problem, and to ensure that interested parties have the opportunity to fully review and respond to the initial comments, Pagenet seeks a one-month extension of the reply date, until January 16, 1998.

PageNet asserts that the extension requested herein would cause no undue harm to any interested parties. To the contrary, the extension will allow interested parties to provide the Commission with a more fully developed record upon which it may determine whether further action is warranted.

WHEREFORE, PageNet respectfully requests that the Commission grant its motion and extend the comment date from December 1, 1997, to December 15, 1997, and extend the reply comment date from December 16, 1997, to January 16, 1998.

Respectfully submitted,

PAGING NETWORK, INC.

By: Judith St. Ledger-Roty  
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DATED: November 21, 1997